

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
Comcast Cable Communications, LLC,)
on behalf of its subsidiaries and affiliates)
)
For Determination of Effective Competition in:)
Piedmont, CA (CA0588))

CSR No. _____

To: Chief, Media Bureau

PETITION FOR SPECIAL RELIEF

Comcast Cable Communications, LLC, on behalf of its subsidiaries and affiliates (“Comcast”), pursuant to Sections 76.7 and 76.907 of the Commission’s rules,¹ requests that the Commission find that Comcast faces “effective competition” in the above-referenced California franchise area (the “Franchise Area”).

The Communications Act of 1934, as amended (the “Act”), and the Commission’s rules provide that cable television rates may be regulated only in the absence of effective competition.² Cable operators are entitled to demonstrate that effective competition exists on a franchise-by-franchise basis.³ When a cable operator demonstrates that effective competition exists within a franchise area, cable rates in the affected area are no longer subject to regulation.⁴

¹ 47 C.F.R. §§ 76.7 and 76.907.

² 47 U.S.C. § 543(a)(2); 47 C.F.R. § 76.905(a).

³ 47 C.F.R. § 76.907.

⁴ See *Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992, Rate Regulation*, 8 FCC Rcd. 5631, 5664-5665 (1993) (“Rate Order”).

Under the “competing provider” test set forth in Section 623(1)(1)(B) of the Act and Section 76.905(b)(2) of the Commission’s rules (the “Competing Provider Test”), a cable system will be deemed subject to effective competition if:

- (i) the franchise area is served by at least two unaffiliated multichannel video programming distributors (“MVPDs”), each of which offers comparable programming to at least 50 percent of the households in the franchise area; and
- (ii) the number of households subscribing to multichannel video programming other than the largest MVPD exceeds 15 percent of the households in the franchise area.⁵

As demonstrated below, the Competing Provider Test is satisfied in the Piedmont Franchise Area because two unaffiliated MVPDs serve over 50 percent of the Franchise Area’s households with comparable programming and the reported penetration rate for DBS providers exceeds the 15 percent threshold in the Franchise Area.

I. THE COMPETING PROVIDER TEST IS SATISFIED IN THE FRANCHISE AREA

The two prongs of the Competing Provider Test are straightforward and objective. Both prongs of this test clearly are satisfied in the Franchise Area.

A. More Than Two Unaffiliated MVPDs Offer Programming Comparable to Comcast to Over 50 Percent of the Households in the Franchise Area.

The first prong of the Competing Provider Test requires that a franchise area must be served by “at least two unaffiliated multichannel video programming distributors...”⁶ This

⁵ 47 U.S.C. § 543(1)(1)(B)(i) and (ii); 47 C.F.R. § 76.905(b)(2)(i) and (ii).

⁶ 47 U.S.C. § 543(1)(1)(B)(i); 47 C.F.R. § 76.905(b)(2)(i). Section 602 of the Communications Act of 1934, as amended, defines “multichannel video programming distributors” to include cable operators, as well as DBS and MMDS providers. See 47 U.S.C. § 522(13).

requirement is easily satisfied, because the two major direct broadcast satellite providers (DirecTV, Inc. and Dish Network, Corp.) (“DBS Providers”) are unaffiliated with Comcast and “offer” programming that is comparable to Comcast to more than 50 percent of the households in Comcast’s Franchise Area.

Service of an MVPD will be deemed “offered” when it is both technically and actually available.⁷ The Commission has determined that DBS service is presumed to be “technically available” throughout the country due to its nationwide satellite footprint.⁸ Comcast’s Franchise Area is well within the satellite footprint of DirecTV and Dish Network. Thus, both DirecTV and Dish Network are “technically available” in the Franchise Area.

DBS service is presumed to be “actually available” if households in a franchise area are made “reasonably aware” that the service is available.⁹ The Commission has stated that “a party may use evidence of penetration rates in the franchise area (the second prong of the competing provider test ...) coupled with the ubiquity of DBS services to show that consumers are

⁷ *Rate Order* at ¶ 29.

⁸ *See MediaOne of Georgia, Inc; Petition for Revocation of the Certification of Gwinnett County, Georgia*, 12 FCC Rcd. 19406, ¶ 5 n.16 (1997) (citing *Rate Order*, at 5660-5661).

⁹ *See Rate Order* at ¶ 32 (citations omitted). *See also Charter Communications, LLC d/b/a Charter Communications Petition for Determination of Effective Competition in Fourteen North Carolina Communities, et al*, 19 FCC Rcd. 7003, ¶ 4 (2004).

reasonably aware of the availability of DBS service.”¹⁰ The same reasoning applies here.

DirecTV and Dish Network are among the largest MVPDs in the nation.¹¹ With approximately 33.6 million subscribers nationwide,¹² comprising over 33.6 percent of all MVPD subscribers,¹³ ubiquitous advertising, and the substantial DBS penetration figure in the Franchise Area, it is clear that consumers in the Franchise Area are “reasonably” aware of the availability of DBS competitors.¹⁴ Accordingly, both DirecTV and Dish Network are presumed to be “actually available” in the Franchise Area, and are offered to over 50 percent of the households in the Franchise Area.

¹⁰ *Comcast Cable Communications, LLC Petition for Determination of Effective Competition in Various Michigan Communities*, 23 FCC Rcd. 9595, ¶ 5 (2008), citing *Mediacom Illinois LLC et al., Eleven Petitions for Determination of Effective Competition in Twenty-Two Local Franchise Areas in Illinois and Michigan*, 21 FCC Rcd. 1175 (2006) (“*Comcast – Various Michigan Communities*”). Thus, the Commission has not required the production of advertising to demonstrate that households in the franchise area are “reasonably aware” of the availability of DBS service. See *Bright House Networks, LLC Petition for Determination of Effective Competition (Lake Alfred and Dundee FL)*, 22 FCC Rcd. 4390, ¶ 6 (2007) (“Over more than ten years, we have made hundreds of findings that households in particular franchise areas are reasonably aware that they may purchase DBS services based on localized evidence. These accumulated showings amount to substantial evidence that households in all franchise areas are reasonably aware that they may purchase DBS services. In at least one earlier reported decision, we found households in a franchise area to be reasonably aware that they may purchase DBS service solely based on evidence of DBS’s nationwide growth and local subscriptions, without reference to advertising or other promotion.”) (“*Bright House Networks – Florida*”).

¹¹ See *Thirteenth Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming*, MB Docket No. 06-189, FCC 07-206, ¶ 76 (rel. Jan. 16, 2009).

¹² See Press Release, DirecTV, *DirecTV Announces First Quarter 2011 Results* (May 5, 2011) (reporting that, as of Mar. 31, 2011, DirecTV had 19.4 million subscribers), available at <http://investor.directv.com/releasedetail.cfm?ReleaseID=574719>; Press Release, DISH Network, *DISH Network Reports First Quarter 2011 Financial Results* (May 2, 2011) (reporting that, as of Mar. 31, 2011, Dish Network had approximately 14.2 million subscribers), available at <http://dish.client.shareholder.com/releasedetail.cfm?ReleaseID=573404>.

¹³ Press Release, SNL Kagan’s *U.S. Multichannel Subscribers 4th Quarter 2010 Results*, SNL Kagan, March 15, 2011, available at <http://www.snl.com/InTheMedia.aspx> (reporting approximately 100.1 million video subscribers in the U.S.).

¹⁴ See, e.g., *Comcast – Various Michigan Communities* at ¶ 5; *Bright House Networks – Florida* at ¶ 6.

The Competing Provider Test also requires that the programming offered by the competing provider must be “comparable” to the programming offered by the cable operator.¹⁵ The Commission’s rules define comparable programming as “at least 12 channels of video programming, including at least one channel of nonbroadcast service programming.”¹⁶ The Commission has repeatedly recognized that the DBS Providers offer comparable programming under the Commission’s Competing Provider Test.¹⁷ Each of the DBS Providers offer well over 100 video channels, most of which are non-broadcast services.¹⁸ And, as shown in the attached channel line-up, Comcast’s programming service offerings in the Franchise Area are substantially similar to the DBS Providers’ programming services.¹⁹

Based on the above facts, Comcast has satisfied the first prong of the Competing Provider Test.

B. The Competing Providers Serve Greater Than 15 Percent of the Households In Comcast’s Franchise Area.

The second prong of the Competing Provider Test requires that the subscriber base of competing MVPDs, other than the largest MVPD, exceeds 15 percent of franchise area households.

The process of determining the precise number of DBS subscribers within a franchise area is not an exact science because DBS Providers track their subscribers according to the zip

¹⁵ See 47 U.S.C. § 543(1)(1)(B)(i); 47 C.F.R. § 76.905(b)(2)(i).

¹⁶ 47 C.F.R. § 76.905(g).

¹⁷ See, e.g., *Comcast Cablevision of Maryland, Inc., Petitions for Determination of Effective Competition (Charles County, MD)*, 19 FCC Rcd. 7130, ¶ 4 (2004) (“We find that the programming of DBS providers satisfies the Commission’s program comparability criterion because DBS providers offer more than 12 channels of video programming, including more than one non-broadcast channel.”).

¹⁸ See Channel Line-ups of DirecTV and Dish Network, attached hereto as Exhibit 1.

¹⁹ See Comcast Channel Line-up, attached hereto as Exhibit 2.

codes where each subscriber resides, rather than by political jurisdiction. In this case, Comcast relied on ZIP+4 codes associated with the Franchise Area in order to determine the number of DBS subscribers within the Franchise Area. The Commission has previously accepted ZIP+4 codes as “reasonable and sufficiently reliable for purposes of determining the presence of effective competition,”²⁰ and stated its preference for this approach.²¹

To determine the relevant ZIP+4 codes for the Franchise Area, Comcast contacted Media Business Corp. (“MBC,” previously known as “SkyTrends”). MBC has developed a process to accurately identify the ZIP+4 codes that correspond with the political boundaries of a particular community. This process utilizes enhanced mapping software that correlates ZIP+4 codes with the U.S. Census Department’s “block group” level households. The “block group” measurement is the most precise Census tool available to measure households within a very small geographical area. With this software, MBC was able to identify the ZIP+4 codes that lie within the Franchise Area.²²

Comcast next provided all of the ZIP+4 codes for the Franchise Area to the Satellite Broadcasting and Communication Association (“SBCA”). SBCA is the national trade association representing the two major DBS Providers, and it has assumed the responsibility for compiling subscribership data and responding to data requests from cable operators and franchising authorities engaged in effective competition proceedings. The DBS subscriber numbers reported in the attached Effective Competition Tracking Reports (“ECTR”) from SBCA

²⁰ See *Cable One, Inc. Petition for Determination of Effective Competition in Pocatello, Idaho*, 18 FCC Rcd. 12792, ¶ 8 (2003), quoting *Falcon Cable Systems II, a California Limited Partnership, d/b/a Charter Communications Petition for Determination of Effective Competition in Twelve Oregon Cities*, 17 FCC Rcd. 4648 (2002).

²¹ See Public Notice, “Commission Announces New Standards for Showings of Effective Competition For Cable Service,” 23 FCC Rcd. 12067 (2008).

²² See Letter from MBC (explaining ZIP+4 methodology), attached hereto as Exhibit 3.

reflect the total DBS subscribers within the individual ZIP+4 codes associated with the Franchise Area.²³

Finally, Comcast compared the DBS subscribership figures reported by SBCA on a ZIP+4 basis with its own subscribership, and was able to confirm that its own subscribership exceeded DBS subscribership in the Piedmont Franchise Area. Comcast is the largest MVPD in this Franchise Area.

To determine whether DBS subscribership exceeds the statutorily mandated 15 percent threshold in the Franchise Area, Comcast compared the competing providers' subscribership to the most recent U.S. Census occupied household unit figures for the community.²⁴ This comparison yields the penetration rate for DBS Providers in the Franchise Area.

As detailed in Exhibit 6, the subscriber rate for the DBS Providers in the Franchise Area exceeds the 15 percent threshold required under Section 623(1)(1)(B) of the Act. Accordingly, Comcast meets the second prong of the Competing Provider Test.

Because Comcast meets both prongs of the Competing Provider Test in the Piedmont Franchise Area, it faces effective competition in this Franchise Area.

CONCLUSION

Comcast's cable system is subject to effective competition in the Piedmont Franchise Area under the Competing Provider Test. Based on the evidence presented herein, Comcast respectfully requests that the Media Bureau issue an order acknowledging the presence of

²³ See Exhibit 4 (providing total ZIP+4-based DBS subscribership for the Franchise Area, as well as all ZIP+4 data relied on in the Petition).

²⁴ In this case, 2010 Census Data were available and utilized. Household data figures are available at <http://factfinder.census.gov>, the relevant pages of which are attached hereto as Exhibit 5.

effective competition in the Piedmont, California Franchise Area as of the filing date of this Petition.

Respectfully submitted,

Comcast Cable Communications, LLC
on behalf of its subsidiaries and affiliates

By: 

Brian J. Hurh

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(202) 973-4200

April 6, 2012

Its Attorneys

CERTIFICATION PURSUANT TO 47 C.F.R. § 76.6(a)(4)

The below-signed signatory has read the foregoing Petition for Special Relief, and to the best of my knowledge, information and belief formed after reasonable inquiry, it is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification or reversal of existing law; and is not interposed for any improper purpose.

Respectfully submitted,

Comcast Cable Communications, LLC
on behalf of its subsidiaries and affiliates

By:



Brian J. Hurh

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Washington, DC 20006
(202) 973-4200

April 6, 2012

Its Attorney

DECLARATION OF WARREN FITTING

I, Warren Fitting, declare, under penalty of perjury that:

1. I am the Senior Director of Regulatory Accounting for Comcast Cable Communications, LLC ("Comcast").
2. I have read the foregoing Petition for Special Relief ("Petition") and am familiar with the contents thereof and the matters referred to therein.
3. I have reviewed Comcast's respective cable subscriber numbers for the Franchise Area at issue in this Petition, as well as the DBS subscriber numbers provided by SBCA for the Franchise Area as described in the Petition. Comcast is the largest multichannel video program provider in the Piedmont Franchise Area.
4. The facts contained within the Petition are true and correct to the best of my knowledge, information and belief.

March 30, 2012
Date

Warren O. Fitting
Warren Fitting

EXHIBIT 1



PREMIER package

285+ digital channels

Print channels for ZIP Code 17303 (No locals available)

PRINT

EN ESPAÑOL

ONCE México*	447	V-me*	440	mun2	410
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NATIONALS

3net (HD)	HD 107	Disney Channel (West)	291	Hope*	368	RFD TV	345
A&E	HD 265	Disney XD	HD 292	INSP	364	ReelzChannel	238
ABC Family	HD 311	Documentary Channel	267	ION Television	305	SOAPnet	262
American Movie Classics (AMC)	HD 254	E! Entertainment	236	ION Television West	347	Science Channel	HD 284
Animal Planet	HD 282	ESPN	HD 206	Independent Film Channel (IFC)	559	ShopNBC	316
Audience Network	HD 239	ESPN 3D (HD)	HD 106	Investigation Discovery (ID)	285	Speed Channel	HD 607
BBC America	264	ESPN2	HD 209	Jewelry Television	313	Spike	HD 241
BYU TV	374	ESPNEWS	HD 207	Jewish Life Television*	366	Style	235
Big Ten Network	HD 610	ESPNU	HD 208	Lifetime	HD 252	Syfy Channel	HD 244
Biography Channel	HD 266	EWTN	370	Lifetime Movie Network	253	TBS	HD 247
Black Entertainment Television (BET)	HD 329	Enlace Christian Television*	448	LinkTV	375	TCT Network	377
Bloomberg Television	353	FUEL TV	HD 618	Logo	272	TNT	HD 245
Boomerang	298	FX	HD 248	MHz WORLDVIEW*	2183	TV Guide Network	273
Bravo	HD 237	Food Network	HD 231	MLB Network	HD 213	TV Land	304
CBS Sports Network	HD 613	Fox Business Network	HD 359	MSNBC	HD 356	TV One	328
CCTV-9	2053	Fox Movie Channel	258	MTV	HD 331	TeenNick	303
CMT	HD 327	Fox News Channel	HD 360	MTV2	333	Tennis Channel	HD 217
CNBC	HD 355	Free Speech TV*	348	Military Channel	287	The Hub	294
CNBC World	357	Fuse	339	NASA TV	289	The Learning Channel	HD 280
CNN	HD 202	GEM NET (Global Expansion Media Network)*	2068	NBA TV	HD 216	The Sportsman Channel	605
CSPAN 1	350	GOD TV	365	NFL Network	HD 212	The Word Network	373
CSPAN 2	351	GSN, the network for games	233	NHL Network	HD 215	Travel Channel	HD 277
Cartoon Network (East)	HD 296	Galavision	404	NRB	378	Trinity Broadcasting Network (TBN)	372
Cartoon Network (West)	297	Go!TV HD English	HD 620	Nat Geo WILD	283	TruTV	246
Centric	330	Golden Eagle Broadcasting*	363	National Geographic Channel	HD 276	Turner Classic Movies (TCM)	256
Chiller	257	Golf Channel	HD 218	Nick Jr.	301	USA Network	HD 242
Christian Television Network (CTN)	376	Gospel Music Channel	338	Nickelodeon (East)	HD 299	Univision	402
Church Channel	371	Great American Country	326	Nickelodeon (West)	300	VH1	HD 335
Cloo	308	H2	271	Nicktoons Network	302	VH1 Classic	337
Comedy Central	HD 249	HD Theater	HD 281	OWN	279	Versus	HD 603
Cooking Channel	232	HDNet	HD 306	Ovation TV	274	WE: Women's Entertainment	260
Current TV	358	HITN*	438	Oxygen	251	WGN America	HD 307
DIY Network	230	Hallmark Channel	HD 312	PBS	0	Weather Channel	HD 362
Daystar	369	Headline News	204	PBS Kids Sprout	295	World Harvest Television	367
Discovery Channel	HD 278	History Channel	HD 269	Planet Green	HD 286	n3D	HD 103
Discovery Fit & Health	261	Home & Garden Television (HGTV)	HD 229	Pursuit Channel	608		
Disney Channel (East)	HD 290	Home Shopping Network	240	QVC	275		

PREMIUMS

SSTARMAX HD East	HD 520	FLIX ON DEMAND®	1557	MoreMAX	HD 517	STARZ® ON DEMAND	1527
@MAX HD East	HD 523	FOX Deportes	624	Outdoor Channel	606	Showtime Beyond HD	HD 550
ActionMAX HD	HD 519	Flix	557	SHOWTIME	HD 545	Showtime Next HD	HD 551
Cinemax East	HD 515	Fox Soccer Channel	HD 619	SHOWTIME (West)	HD 546	Showtime Women HD	HD 552
Cinemax West	HD 516	Go!TV	620	SHOWTIME 2	HD 547	Sundance Channel	558
ENCORE (East)	HD 535	HBO (East)	HD 501	SHOWTIME Extreme	HD 549	Sundance ON DEMAND	1558
ENCORE (West)	536	HBO (West)	HD 504	SHOWTIME ON DEMAND	1545	THE MOVIE CHANNEL™ ON DEMAND	1554
ENCORE Action	541	HBO 2 (East)	HD 502	SHOWTIME Showcase	HD 548	TMC Xtra HD East	HD 556
ENCORE Drama	540	HBO 2 (West)	HD 505	STARZ (East)	HD 527	TVG - The Interactive Horseracing Network	602
ENCORE Family	542	HBO Comedy HD	HD 506	STARZ (West)	HD 528	The Movie Channel (East)	HD 554

PREMIUMS

ENCORE Love	537	HBO Family (East)	HD 507	STARZ Cinema HD	HD 531	The Movie Channel	555
ENCORE Suspense	539	HBO Family (West)	508	STARZ Comedy HD	HD 526	ThrillerMAX HD	HD 522
ENCORE Westerns	538	HBO Latino	HD 511	STARZ Edge	HD 529	WMAX HD East	HD 521
ENCORE ON DEMAND	1535	HBO Signature	HD 503	STARZ InBlack	HD 530		
ESPN Classic Sports	614	HBO Zone HD	HD 509	STARZ Kids & Family HD	HD 525		

REGIONAL SPORT NETWORKS

Altitude Sports & Ent.	HD 681	FS Arizona	HD 686	FS South Plus (Z)	HD 648	ROOT SPORTS Rocky	HD 683
Altitude Sports	HD 682	FS Cincinnati	HD 661	FS Southwest	HD 676	Mountain	
Altitude Sports		FS Detroit	663	FS Southwest Plus	HD 677	SportSouth	HD 649
Altitude Sports		FS Detroit Plus	HD 664	FS West	HD 692	SportSouth Plus	HD 650
CSN Bay Area	HD 696	FS Florida	HD 654	MASN 640	HD 640	SportsNet New York 639	HD 639
CSN Bay Area Alternate	HD 697	FS Florida Plus	HD 655	MSG Plus 635	HD 635	SportsTime Ohio 662	HD 662
CSN California	HD 698	FS Midwest	HD 671	Madison Square Garden	HD 634	Sun Sports	HD 653
CSN California alt 699	699	FS North	HD 668	634		Sun Sports Plus	HD 656
CSN Chicago Alt. #2	667	FS Ohio	HD 660	NESN 628	HD 628	Yankee Ent. & Sports	HD 631
CSN MidAtlantic Alt.	HD 643	FS South	HD 646	Prime Ticket	HD 694	(YES) 631	
CSN MidAtlantic 642	HD 642	FS South Plus	HD 647	ROOT SPORTS Northwest	HD 687		
CSN New England 630	HD 630			ROOT SPORTS Pittsburgh	HD 659		
Comcast SportsNet	HD 665						
Chicago 665							

SATELLITE RADIO

SONICTAP: 60's Revolution	803	SONICTAP: College Rock	831	SONICTAP: Italian Bistro Blend	881	SONICTAP: Regional Mexican	873
SONICTAP: 70's Hits	804	SONICTAP: Dance	859	SONICTAP: Italian Contemporary	882	SONICTAP: Retro Disco	845
SONICTAP: 8-Tracks	840	SONICTAP: Familiar Favorites	880	SONICTAP: Jazz	852	SONICTAP: Rock en Espanol	878
SONICTAP: 80's Hits	805	SONICTAP: Fiesta Tropical	870	SONICTAP: Latin Hits	871	SONICTAP: Salsa	874
SONICTAP: 90's Hits	806	SONICTAP: Flashback/New Wave	839	SONICTAP: Latin Jazz	879	SONICTAP: Showtunes	823
SONICTAP: Adult Alternative	832	SONICTAP: Folk Rock	813	SONICTAP: Light Classical	866	SONICTAP: Silky Soul	843
SONICTAP: Adult Contemporary	821	SONICTAP: Full Metal Jacket	830	SONICTAP: Love Songs	819	SONICTAP: Silver Screen	822
SONICTAP: Alternative	834	SONICTAP: Gospel Glory	827	SONICTAP: Malt Shop Oldies	802	SONICTAP: Singer-Songwriters	836
SONICTAP: Bailamos!	869	SONICTAP: Great Standards	855	SONICTAP: Mariachi	876	SONICTAP: Smooth Jazz	851
SONICTAP: Be-Tween	867	SONICTAP: Groove Lounge	824	SONICTAP: Metro Blend	853	SONICTAP: Soft Hits	849
SONICTAP: Beautiful Instrumentals	820	SONICTAP: Hair Guitar	829	SONICTAP: Modern Country	814	SONICTAP: Spike	841
SONICTAP: Big Band/Swing	801	SONICTAP: Hallelujah	828	SONICTAP: Modern Workout	860	SONICTAP: Subterranean	858
SONICTAP: Bluegrass	812	SONICTAP: Hit Country	809	SONICTAP: Musica De Las Americas	872	SONICTAP: Symphonic	864
SONICTAP: Blues	854	SONICTAP: Holidays & Happenings	815	SONICTAP: New Age	856	SONICTAP: The Boombox	846
SONICTAP: Carnaval Brasileiro	877	SONICTAP: Honky Tonk Tavern	811	SONICTAP: Old School Funk	844	SONICTAP: The Playground	868
SONICTAP: Classic Hits Blend	837	SONICTAP: Hot Jamz	825	SONICTAP: PUMP!	861	SONICTAP: The Spirit	826
SONICTAP: Classic Jazz Vocal Blend	850	SONICTAP: Hottest Hits	818	SONICTAP: Piano	865	SONICTAP: Today's Hits	816
SONICTAP: Classic R&B	842	SONICTAP: Hurbano	875	SONICTAP: Rat Pack	807	SONICTAP: Traditional Country	808
SONICTAP: Classic Rock	833	SONICTAP: Hype	847	SONICTAP: Reality Bites	838	SONICTAP: Tranquility	884
SONICTAP: Classic Rock Workout	862	SONICTAP: Ink'd	835	SONICTAP: Red, Rock and Blues	810	SONICTAP: Y2k Hits	817
SONICTAP: Coffeehouse Rock	848	SONICTAP: Irish	883	SONICTAP: Reggae	863	SONICTAP: Zen	857

LOCALS

WGAL (NBC)	HD 8	WHTM (ABC)	HD 27	WLYH (CW)	15	WPMT (FOX)	HD 43
WHP (CBS)	HD 21	WITF (PBS)	HD 33				

*The following channels require a special dish or equipment: MHz, GEM NET, Hope Channel, JLTv, Once, HITN, V-Me, Enlace, Golden Eagle Broadcasting, and Free Speech TV. Please call 1-800-531-5000 for more information.

>> Channels & Packages

DISH Network

AVAILABLE TO ALL CUSTOMERS

BEST	Best	219	PREVW	Free Preview Guide	102
LQCH	Liquidation Channel	274	IDEAL	IDEAL	101
EARTH	DISH Earth	287	ONPPV	Pay-Per-View Guide	500
DN101	DISH 101	101	TV	TV	101
HOME	DishHOME	100			

DishFAMILY Featuring the best family-friendly programming

ALIVE	America Live	219	HMC	Hallmark Movie Channel	187
ANGEL	Angel One	262	HSN	HSN	84
ANGL2	Angel Two	266	HSN2	HSN2	265
APL	Animal Planet	184	HUB	Hub	179
BIO	Bio	119	INSPIRE	Inspiration Network	259
BITV	Bloomberg Television	203	JTV	Jewelry Television	227
BOOM	Boomerang SAP	175	NICK	Nick/Nick at Nite (E)	170
BUY1	Buy1	221	NICKY	Nicktoons Network	178
CBSSN	CBS Sports Network	152	QVC	QVC	137
CCTV	CCTV-E	683	REC	REC	211
CCNEW	CCTV-News	265	SALE	Sale	225
COOK	Cooking Channel	113	SOI	Solara	133
CSPN2	C-SPAN2	211	SHOP	shop	224
DYSTR	Daystar	203	SHO	Sho	311
DIY	DIY	111	TVLND	TV Land	108
DOC	Documentary Channel	197	TVO	TV One	111
FOOD	Food Network	110			
FXNWS	FOX News Channel	203			
FSC	FOX Soccer Channel	406			
GEMS	Gems and Jewelry	223			
GAC	Great American Country (GAC)	167			
HLMK	Hallmark Channel	185			

Sports Networks

ALTUD	Altitude Sports & Entertainment	HD 410	FOXOH	Fox Sports Ohio	HD 425
CSTNO	Cox Sports Television New Orleans	HD 421	PRIME	Fox Sports Prime Ticket	HD 411
CSNBA	Comcast SportsNet Bay Area	HD 419	FOXSW	Fox Sports Southwest	HD 410
CSNCA	Comcast SportsNet California	HD 409	FOXW	Fox Sports West	HD 417
CSNCH	Comcast SportsNet Chicago	HD 429	FUEL	FUEL TV	398
CSNMA	Comcast SportsNet Mid-Atlantic	HD 424	MASN	Mid-Atlantic Sports Network	432
CSNNE	Comcast SportsNet New England	HD 435	MASN2	Mid-Atlantic Sports Network America	433
ESPCL	ESPN Classic*	143	NESN	New England Sports Network	HD 434
FSC	Fox Soccer Channel	HD 406	NFLRZ	NFL Red Zone	HD 155
FOX+*	Fox Soccer Plus**	407	RTNW	ROOT Sports Northwest	HD 426
FOAZ	Fox Sports Arizona	HD 415	RTPT	ROOT Sports Pittsburgh	HD 428
FOXCN	Fox Sports Cincinnati	HD 427	RTRM	ROOT Sports Rocky Mountain	HD 414
FOXO	Fox Sports Detroit	HD 430	SFSD	Sports Illustrated	HD 431
FOXFL	Fox Sports Florida	HD 423	STO	SportTime Ohio	HD 431
FOXMW	Fox Sports Midwest	HD 418	SUN	Sun Sports	HD 112
FOXN	Fox Sports North	HD 436			

HD - Channels are broadcast in both SD & HD unless indicated as "HD only." You must have an HD television to view channels in high definition.

BOLD - Channels in bold are some of our most popular channels. **SAP** - FREE Spanish audio feed available. Audio available on Spanish. Available on select HD channels. No extra charge for access to HD. Availability of Regional Sports Networks based on geographical location and programming package subscription. Only available with Multi-Sport Pack. *Available in a la carte.

All programming subject to change without notice. **Requires additional fee to view. Limited number of channels available in HD.

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1 = Public Internet programming available within satellite signal location and programming package. Purchase of a second dish antenna may be required. 2 = Available at no cost to all DISH Network customers. HBO® requires DISH 100 or DISH 101+ and subscription to qualifying programming. Additional fees may apply for select DISH Network customers to upgrade their dish antenna. 3 = Available in Ohio, Michigan, Iowa, Wisconsin, Minnesota, Nevada and sections of Pennsylvania and Indiana. 4 = Baseball East is available to subscribers in the Eastern and Central time zones. Baseball West is available to subscribers in the Mountain and Pacific time zones. Baseball West in HD is available in all time zones.

Blockbuster Movie Pass

Includes Blockbuster by mail. Some restrictions apply. For more information visit dish.com/blockbuster or call 1-800-333-DISH.

CTRC	Centric	HD 371	MGM	MGM	HD 385
CI	Crime & Investigation	HD 368	MPLEX	MPLEX	HD 386
ESUSP	Encore Suspense	344	PLDIA	Palladia	HD 369
EPIX1	EPIX SAP	HD 380	PLX	PLX	HD 370
EPIX2	EPIX2 SAP	HD 381	RETRO	RetroPlex	HD 379
HMC	Hallmark Movie Channel	HD 187	SONY	Sony Channel	HD 111
HDTHR	HD Theater	HD 364	SCINE	Starz Cinema	353
HONMV	HDNet Movies	HD 383	SUND	Sunday Channel	351
INDIE	IndiePlex	HD 378	UNIHO	Universal HD	HD 366
LOGO	LOGO	HD 373	WFL	World Fishing Network	352
MAVTV	MavTV	HD 361			

Some HD channels only available in HD.

Premium Movie Packages

HBO

HBO-E	HBO (E) SAP	HD 300
HBO2E	HBO2 (E) SAP	HD 301
HBO3G	HBO Signature SAP	HD 302
HBO-W	HBO (W) SAP	HD 303
HBO2W	HBO2 (W) SAP	304
HBOFM	HBO Family SAP	HD 305
HBOCY	HBO Comedy SAP	HD 307
HBOZ	HBO Zone - HD only	HD 308
HBOLT	HBO Latino	HD 309

starz

ENCOR	Encore (E) SAP	HD 340
STARZ	Starz (E) SAP	HD 350
STRZW	Starz (W) SAP	HD 351
SEDGE	Starz Edge SAP	HD 352
SCINE	Starz Cinema SAP	353
STZC	Starz Comedy	HD 354
SBCLK	Starz InBlack SAP	355
SK&FM	Starz Kids & Family SAP	HD 356

CTC

MAX-E	Cinemax (E) SAP	HD 310
MAX-W	Cinemax (W) SAP	HD 311
MOMAX	MoreMAX SAP	312
AGMAX	AdultMAX SAP	HD 313
5-MAX	5StarMAX SAP	HD 314

SHOWTIME

SHO-E	Showtime (E) SAP	HD 318
SHO-W	Showtime (W) SAP	HD 319
SHOTO	Showtime 2 SAP	HD 320
SHOQ	Showtime Showbase SAP	HD 321
SHOEX	Showtime Extreme SAP	322
SBYND	Showtime Beyond SAP	323
TMC-E	The Movie Channel (E) SAP	HD 327
TMCX	The Movie Channel (W) SAP	328
FLIX	FLIX	333

Programming subject to change without notice. **Requires additional fee to view. Limited number of channels available in HD.

DISH Cinema and Pay-Per-View Sports & Events

MOVIE	DISH Cinema	1, 103, 600-558	SPORT	Sports Events	1, 103, 600-558
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Need some help?

WE CAN ANSWER YOUR QUESTIONS ONLINE:

- dish.com/supportcenter
- facebook.com/dishnetwork
- twitter.com/dishnetwork

YOU CAN ALSO FIND ANSWERS HERE:

- Receiver User's Guide
- Channel 100 - DISHHOME Interactive TV
- DISH 101 - Support Channel (CPS 101)
- Customer Support 1-800-333-DISH (TV)



Connect your receiver to broadband Internet or a phone line to get more out of your DISH service. For more info visit: dish.com/getconnected.

dish Let's Watch TV

Channels & Packages

America's Top 120 with HD

America's Top 120 includes channels listed below. **HD** indicates channels available in both standard and high definition, except where noted as HD-only.

A&E	A&E	HD	118	ION	ION (E)	216
ABCFM	ABC Family		180	IONW	IONW	217
ALIVE	America Live		219	JTV	Jewelry Television	227
ANGEL	Angel One		262	LIFE	Lifetime	HD 108
ANGL2	Angel Two		268	MALL	Mail	220
BTV	Business Television		9602	MTV	MTV	HD 160
BUY	Buy!		221	MTV2	MTV2	161
TOON	Cartoon Network (E)	SAP	176	NICK	Nick (E)	HD 170
TOONW	Cartoon Network (W)		177	NICKW	Nick/Nick at Nite (W)	171
CCTV-E	CCTV-E		884	QVOD	QVOD	187
CCNEW	CCTV-News		265	REELZ	ReelChannel	299
CHRCN	Church Channel		258	SAGE	SAGE	226
CMT	CMT	HD	166	SHOP	shop	224
CNBC	CNBC	HD	208	SHO	SHO	228
CNN	CNN	HD	200	SBN	SonLife Broadcasting Network	257
CMDY	Comedy Central	HD	107	SPK	SPK	HD 186
CSPN2	C-SPAN2		211	SYFY	Syfy	HD 122
DYSTR	Daystar		263	TBS	TBS	HD 188
DISC	Discovery Channel	HD	182	TLC	TLC	HD 183
DISE	Disney Channel (E)		172	TNT	TNT	HD 136
DISW	Disney Channel (W)		173	TRV	Travel Channel	HD 136
DOC	Documentary Channel		197	TVGM	TV Game Network	405
EI	EI Entertainment Television	HD	114	TVGN	TV Guide Network	117
ESPN	ESPN	HD	140	TVLN	TV Land	108
ESPN2	ESPN2	HD	144	USA	USA	HD 105
ESNWS	ESPNEWS		142	VH1	VH1	HD 162
ESPN	ESPN		141	TWC	Weather Channel	HD 214
FOOD	Food Network	HD	110	Plus DishCD Music Channels		950-981
FXNWS	FOX News Channel	HD	205	Christian		975
FX	FX	HD	136	Classical		970-973
GEMS	Gems & Jewelry TV		229	Country		951-952
HDNET	HDNet -HD only	HD	362	Electronic & Dance		958-966, 977
HGTV	HGTV	HD	112	Family & Kids		976
HIST	History	HD	120	Hip-Hop/R&B		963
HLN	HLN	HD	202	Jazz & Blues		962, 967, 968, 978
HRTV	HorseRacing TV		404	Latin & International		981
HSN	HSN		84	Pop		950, 955, 956, 965
HSN2	HSN2		220	Rock		963, 964, 957, 958, 961, 969, 970, 980
IGTV	In Country Television		230	Standards		964, 974
INSP	Inspiration Network		259			

Local Networks channel range 2-70

abc	OCBS	NBC	FOX
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Public Interest Channels¹

ALMA	Alma Vision Hispanic Network	9413	KBS	KBS World ²	9850
BABY1	BabyFirstTV	9400	LINK	LinkTV	9410
BYUTV	BYUTV	9403	PNTGN	Pentagon Channel	9405
CTN	Christian TV Network	9401	IMPCT	The Impact Network	9397
ARTS	Classic Arts Showcase	9408	UCTV	University of California TV	9412
CSPAN	C-SPAN	9402			
EWTV	Eternal Word Television Network ^{SAP}	261			
FSTV	Free Speech TV	9404			
HHS	Health & Human Services	9402			
HITN	HITN	9405			

BOLD - Channels in bold are some of our most popular channels.

SAP - FREE Spanish audio feed available. Audio disponible en español. Available on select HD channels. No está disponible en todos los canales HD.

HD - Channels are broadcast in both SD & HD unless indicated as "HD only." You must subscribe to the HD package to receive the HD feed. You must have an HD television to view channels in high definition. All programming subject to change without notice.

America's Top 200 with HD

America's Top 200 includes all of America's Top 120 plus the channels listed below. **HD** indicates channels available in both standard and high definition.

AMC	AMC	HD	130
APL	Animal Planet	HD	131
BBCA	BBC America	HD	135
BET	BET	HD	141
BIG10	Big Ten Network ³	HD	439
BRAYO	Bravo	HD	132
CBSSN	CBS Sports Network	HD	152
CURNT	Current TV		174
DISXD	Disney XD ^{SAP}		174
G4	G4	HD	131
GLVSN	Galavision	HD	273
GOLF	Golf Channel	HD	141
GSN	GSN	HD	116
HLMRK	Hallmark Channel	HD	131
IFC	IFC		131
ID	Investigation Discovery	HD	132
LMN	Lifetime Movie Network	HD	109
MLBN	MLB Network	HD	131
MSNBC	msnbc	HD	209
NTBEO	National Geographic Channel	HD	131
NBATV	NBA TV	HD	156
NFL	NFL Network	HD	151
NHLN	NHL Network	HD	157
NKJR	Nick Jr.		131
NUVO	nuvoTV		159
OVATN	Ovation		131
OWN	OWN: Oprah Winfrey Network	HD	189
OXYGN	Oxygen	HD	132
RFDTV	RFD-TV	HD	231
SOAP	SOAPnet		131
SPEED	SPEED	HD	150
STYLE	Style	HD	116
TNCK	TeenNick		181
FTRAE	TeleFutura (E)		211
FTRAW	TeleFutura (W)	HD	272
TRU	truTV	HD	211
TCM	Turner Classic Movies	HD	132
UNVSN	Univision (E)	HD	110
UNVSW	Univision (W)		828
WE	WE tv		132
WGN	WGN America	HD	239
Plus SiriusXM Music Channels			6002-6090
Christian			6083, 6084
Classical			6085, 6086
Country			6058, 6059-6061
Electronic & Dance			6062-6063
Hip Hop/R&B			6044-6049
Jazz & Blues			6070-6071
Latin & World			6090
Pop			6072-6073, 6074-6075
Rock			6019-6042

Attention:

For the most up-to-date information, please visit www.fox.com.

America's Top 250 with HD

America's Top 250 includes all of America's Top 200 plus the channels listed below. Additional antenna required. **HD** indicates channels available in both standard and high definition, except where noted as HD-only.

BIO	Bio	HD	119
BITV	Bloomberg Television	HD	203
BOOM	Boomerang ^{SAP}		175
CHLR	Chiller		199
CLOO	Clooney		198
CNBCW	CNBC World		207
COOK	Cooking Channel	HD	113
DIY	DIY	HD	111
ENCOR	Encore (E) -HD only		340
ENCORW	Encore (W) -SAP		341
EACTA	Encore Action		343
EDRAM	Encore Drama		345
ENFAM	Encore Family		347
ELOVE	Encore Love		348
ENSUSP	Encore Suspense		344
EWSTN	Encore Westerns		342
FOX8	Fox Business Network	HD	206
FOXMO	Fox Movie Channel		133
FSC	Fox Soccer Channel	HD	406
FUEL	FUEL TV		398
GMC	gmc		188
GAC	Great American Country (GAC)		167
H2	H2	HD	121
HMC	Hallmark Movie Channel	HD	167
HUB	Hub	HD	179
MIL	Military Channel		195
MPLEX	MoviePlex		377
MUN2	mun2		638
NATGEO	Nat Geo WILD	HD	190
NICKT	Nicktoons Network		178
OTDC	Outdoor Channel		396
GREEN	Planet Green	HD	194
SCI	Science	HD	193
SPMAN	Sportsman Channel	HD	395
TENNIS	Tennis Channel	HD	400
TMC-W	The Movie Channel (W) -SAP		329
TMCWV	The Movie Channel xtra (W) -SAP		330
EPX3	The Three from EPIX ^{SAP}		292
VERIA	Veris	HD	218
VS.	Versus	HD	151
VH1CL	VH1 Classic		163
Plus DISH Music Channels			923-946
Country			937
Electronic & Dance			925, 928, 945
Hip-Hop/R&B			939
Jazz & Blues			927
Latin & International			944
Pop			923, 926, 929, 931
Rock			924, 930, 933-936, 946
Standards			938

EXHIBIT 2

International²

onal Premium Networks
individually priced.
ricing card for details.

Globo (Brazilian)
Globo (Brazilian)
Red Internacional (Brazilian)
TV Portugal (Portuguese)
Eurosatellite (Greek)
Deutsche Welle (German)
MONDE (French)
Italia (Italian)
Russia (Russian)
Channel One Russia (Russian)
Japan (Japanese)
TVN (Vietnamese)
TV South Asian
Asia (South Asian)
Asia (SONY) (South Asian)
Cricket (South Asian)
India PLUS (South Asian)
India NEWS (South Asian)
ONE (South Asian)
India GOLD (South Asian)
South Asian (Tamil)
Zhong Tian Channel
Chinese/Mandarin
TV-4 (Chinese/Mandarin)
Xinxi Info News
Chinese/Mandarin
Xinxi North America
Chinese/Mandarin
V-Super Channel
Chinese/Mandarin
Jade (Chinese/Cantonese)
Filipino Channel (Filipino)
A Pinoy TV (Filipino)
A Life TV (Filipino)

High-Definition

Limited Basic

702 KTVU HD (FOX)
703 KNTV HD (NBC)
704 KRON HD (MY)
705 KPIX HD (CBS)
706 KICU HD (IND)
707 KGO HD (ABC)
709 KQED HD (PBS)
711 KKPX HD (ION)
712 KBCW HD (CW)
713 KOFY HD (IND)
714 KDTV HD (UNI)
715 KGO LiveWell HD
716 KFSF HD (TF)
717 KCSM HD (PBS)
718 KSTS HD (TLMD)
722 KRCB HD (PBS)
775 WGN HD
Starter Package 
720 CSN Bay Area HD
721 CSN California HD
723 Versus HD
724 ESPN HD
725 ESPN 2 HD
733 Bravo HD
734 A&E HD
735 TBS HD
736 Syfy HD
737 TNT HD
738 USA HD
739 Universal HD
741 FX - West HD
742 Style HD
743 Spike HD
744 G4 HD
745 Comedy Central HD
746 HGTV HD
747 FOOD Network HD
748 truTV HD
749 Golf HD
750 Discovery Channel HD
751 Animal Planet HD
752 TLC HD
753 E! HD
754 Velocity
755 Travel HD
758 History Channel HD
759 CNN HD
760 Fox News Channel HD
762 CNBC HD
766 Cartoon Network HD
767 Nickelodeon HD
768 ABC Family HD
769 Disney HD
770 Sprout HD
772 Biography Channel HD
774 Headline News HD
776 Weather Channel HD
777 BET HD
778 CMT HD
780 CSN Plus HD
781 VH1 HD
782 MTV HD
783 Palladia HD
787 msnbc HD

High-Definition

793 Hallmark HD
794 Hallmark Movie Channel HD
795 Lifetime HD
796 LMN HD
798 AMC HD
804 Investigation Discovery HD
805 H2 HD
810 BBC America HD
811 HSN HD
812 QVC HD
815 Galavision HD
821 Bloomberg HD
Preferred Package 
726 ESPN News HD
727 NBA TV HD
728 NHL Network HD
729 MLB Network HD
730 NFL Network HD
732 CBS Sports Network HD
740 TV One HD
756 Science HD
757 National Geographic HD
761 Fox Business HD
763 Disney XD HD
764 HD Net
771 Planet Green HD
773 Oxygen HD
779 FUSE HD
784 Outdoor Channel HD
788 ESPN U HD
789 TCM HD
790 IFC HD
791 WE: Women's Entertainment HD
797 MGM HD
806 Nat Geo WILD HD
809 Encore HD
813 The Hub HD
814 Gospel Music Channel HD
822 Game Show Network HD
Sports Entertainment 
726 ESPN News HD
727 NBA TV HD
728 NHL Network HD
729 MLB Network HD
730 NFL Network HD
731 Speed HD
732 CBS Sports Network HD
785 NFL RedZone HD
786 Tennis HD
803 Fox Soccer HD
Premium 
801 HBO HD
808 HBO Latino HD
816 Starz HD
825 Showtime HD
838 Cinemax HD
847 TMC HD
3D
897 XFINITY 3D
898 ESPN 3D
Pay-Per-View HD
450 NBA Pay-Per-View HD
459 NHL/MLB Pay-Per-View 2 HD
460 NHL/MLB Pay-Per-View HD
870 Pay-Per-View HD

Music Choice[®]

901 Hit List
902 Hip-Hop and R&B
903 MC MixTape
904 Dance/Electronica
905 Rap
906 Hip-Hop Classics
907 Throwback Jamz
908 R&B Classics
909 R&B Soul
910 Gospel
911 Reggae
912 Classic Rock
913 Retro Rock
914 Rock
915 Metal
916 Alternative
917 Classic Alternative
918 Adult Alternative
919 Soft Rock
920 Pop Hits
921 90's
922 80's
923 70's
924 Solid Gold Oldies
925 Party Favorites
926 Stage & Screen
927 Kidz Only!
928 Toddler Tunes
929 Today's Country
930 True Country
931 Classic Country
932 Contemporary Christian
933 Sounds of The Season
934 Soundscapes
935 Smooth Jazz
936 Jazz
937 Blues
938 Singers & Swing
939 Easy Listening
940 Classical Masterpieces
941 Light Classical
942 Musica Urbana
943 Pop Latino
944 Tropicales
945 Mexicana
946 Romances

Digital FM Services

960 KQED Public
961 KRCB Public
962 KCSM Jazz
963 KSJO Spanish
964 KREV 92.7 The Revolution
965 KRZZ Spanish
966 KJZY Smooth Jazz
967 KPFA Variety/Berkeley
968 KBAY Adult Contemporary
969 KYLD Hip Hop
970 KRTY Country
971 KBWF SportsRadio 95.7
972 KOIT Adult Contemporary
973 KLLC Hot AC
974 KISQ Urban Contemporary
975 KJFX Classic Rock
976 KSOL Spanish
977 KMQV Moving 99.7
978 KZST Adult Contemporary
979 KBRG Spanish
980 KIOI Hot AC
981 KDFC Classical
982 KBLX Urban Contemporary
983 KKSJ Smooth Jazz
984 KFOG Album Alternative
985 KMHX The New Mix
986 KITS Alternative
987 KMEL Hip Hop
988 KEZR Hot AC
989 KSAN Classic Rock



XFI
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Piedr

- ☐ The Starter Package is required to view these channels
- ☐ The Preferred Package is required to view these channels
- ☐ The Sports & Entertainment Package is required to view these channels
- ☐ You must subscribe to the individual premium service and a Digital Converter or a Digital Package that includes the premium service in order to receive the multiplex version of the same channel

ON DEMAND

from thousands of movies and shows.

Starter

and Network ¹
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 Bay Area
 California
 Network ²
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 mal Planet ²
 Family Channel
 kelodeon ¹
 toon Network ²
 ney Channel ¹
 V ²
 Headline News ¹
 3C
 News Channel ²
 nbc
 Weather Channel ¹
 tory Channel ²
 nedy Central ²
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 TV ²
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 TV ¹
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 Land ²
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Starter

110 C-SPAN 3
 119 Sprout ¹
 128 Bloomberg
 136 G4
 149 MoviePlex
 162 BBC America
 164 ShopNBC
 166 FEARnet (VOD)
 168 Liquidation Channel
 183 Style
 229 EWTN ²
 230 TBN ¹
 271 Investigation Discovery
 275 Biography Channel
 276 H2
 410 CSN Plus/Jewelry TV
 500 Hallmark Movie Channel
 504 LMN

Preferred

107 Current TV
 120 Nick Jr.
 121 The Hub ¹
 122 Disney XD ¹
 126 Nick Toons
 130 Fox Business Network
 134 MTV Jams
 135 MTV 2
 146 Logo
 150 ReelzChannel
 159 Nat Geo WILD
 161 Game Show Network
 165 Oxygen
 167 BBC World News
 180 NFL Network
 182 Cooking Channel
 184 SoapNet
 204 DIY (Do It Yourself) ¹
 205 Retirement Living TV
 215 TeenNick ¹
 216 Nick Too
 220 OWN (Oprah Winfrey Network)
 222 Discovery Fit and Health
 228 BYU TV
 231 Halogen
 234 Daystar TV Network
 270 Ovation TV
 272 Science ¹
 273 National Geographic ¹
 274 The Military Channel
 292 Planet Green
 297 Africa Channel
 332 tvK (Korean)
 334 Mnet (Korean)
 368 MYX (English)
 402 ESPNews
 406 Outdoor Channel
 409 TVG-Horseracing Network
 412 MLB Network
 416 NBA TV
 418 CBS Sports Network
 419 NHL Network
 420 ESPN U
 471 CMT Pure Country
 472 MTV Hits
 473 VH1 Classic
 474 Centric
 476 FUSE

Preferred

477 Nuvo TV
 482 Gospel Music Channel
 483 TV One
 484 GAC
 486 The Word
 501 TCM
 502 WE: Women's Entertainment
 503 IFC
 505 Sundance Channel
 513 IndiePlex
 514 RetroPlex
 516 Encore Family
 518 Encore
 520 Encore Love
 522 Encore Mystery
 524 Encore Westerns
 528 Encore Drama
 530 Encore Action
 586 Flix
 606 Tr3s
 607 mun2

Preferred Plus

534 Starz
 536 Starz Edge
 537 Starz in Black
 538 Starz Cinema
 539 Starz Kids & Family
 540 Starz Comedy
 550 HBO - East
 551 HBO - West
 553 HBO2
 555 HBO Signature
 557 HBO Family
 558 HBO Latino
 559 HBO Comedy
 560 HBO Zone

Premier

561 Cinemax - West
 562 Cinemax - East
 565 MoreMax
 566 ActionMax
 567 ThrillerMax
 576 Showtime
 578 Showtime Too
 580 Showcase
 582 Showtime Extrem
 583 Showtime Next
 584 Showtime Family
 585 Showtime Women
 586 Flix

Premium Services

534-540 Starz & plexe:
 550-560 HBO & plexes
 561-567 Cinemax & pl
 576-586 Showtime & r
 591 The Movie Ch
 593 The Movie Ch
 676 Playboy en Es
 876 Playboy TV (A

Family Tier¹ Requires subscription to Limited Basic and digital converter
Economy Tier² Requires subscription to Limited Basic and digital converter
Starter includes Starter and Limited Basic channels
Preferred Includes Preferred, Starter and Limited Basic channels
Preferred Plus Includes Preferred Plus, Preferred, Starter and Limited Basic channels
Premier Includes Premier, Preferred Plus, Preferred, Starter and Limited Basic channels
☐ Limited Basic - Digital Channels require a digital converter
☐ These packages are available A-la-Carte

¹Limited Cable service is required for certain channels and have a Digital service and a digital converter in **Premium Services²**. You must subscribe to **High-Definition Programming**: Or converter with HDTV capabilities: TV² set (not provided by Comcast). **Programming**: Requires subscription Package to receive HDTV version qualifying digital package and ON DEMAND programs and pricing are underlying premium channel. **DVR**: being recorded. Ask your customer terms and conditions of Comcast si

EXHIBIT 3



Jan 12, 2012

Davis Wright Tremaine LLP
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, DC 20006

To Whom It May Concern:

Media Business Corporation ("MediaBiz") utilizes a multi-step process to accurately identify cable client franchise areas and associated ZIP and ZIP+4 Codes. (A ZIP+4 Code includes the five digits of the United States Postal Service ZIP Code, a hyphen, and four more digits that determine a more precise location than the ZIP Code.)

MediaBiz developed this methodology to address the potential shortcomings in utilizing 5-digit ZIP Code data for "Effective Competition" petitions. This basic methodology has been in place for several years and has been used successfully in many Effective Competition cases at the FCC.

Because ZIP Codes and municipal boundaries are created and managed by different government authorities, the boundaries of ZIP Codes and municipal boundaries often overlap. ZIP Codes frequently span between and beyond municipal boundaries. ZIP+4 Codes, however, usually reside in one and only one municipality. MediaBiz uses Place, Minor Civil Division (MCD), and County boundaries from Dynamap®, a division of Pitney Bowes Business Insight, to determine municipal boundaries. MediaBiz uses the Dynamap® ZIP+4 Centroids database, which contains ZIP+4 centroid correspondence for virtually all deliverable ZIP+4s, to identify ZIP+4 Codes within municipal boundaries, among the over 60 million ZIP+4s in all 50 states, DC, and Puerto Rico, based on current data from the USPS and the U.S. Bureau of the Census, and the Tele Atlas master street database.

MediaBiz then utilizes its ZIP+4 Code mapping to enable our clients to obtain proper "Direct-to-Home" (DTH) subscriber counts for their respective franchise areas by tracking DTH subscribers at the ZIP+4 Code level. (Where MediaBiz determines that a ZIP Code falls entirely within a franchise area, however, it is unnecessary to identify DTH subscribers at the ZIP+4 Code level for that 5-digit ZIP Code. In these instances, MediaBiz identifies such 5-digit ZIP Codes and, accordingly, DTH subscribers are identified by the 5-digit ZIP Code only.

Only ZIP+4 Codes that meet specific criteria are included in this report. The following criteria must be met:

- The centroid of the ZIP+4 Code is within the franchise area; and
- The USPS ZIP+4 Record Type (from Dynamap® ZIP+4 Centroids) is either H - high-rise or S - street

Our methodology has been used by many multiple system operators (MSOs) as part of their Effective Competition relief efforts, and we believe this methodology produces the most accurate and detailed view of ZIP+4 data as it relates to cable franchise areas.


Robert Lehmann
President

MediaBiz

EXHIBIT 4

ECTR – Effective Competition Tracking Report



Provided by
Satellite Broadcasting and Communications Association

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated September 22, 2011 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: October 19, 2011

ZIP Codes

DTH Count

Requested total for Piedmont, CA	669
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Data is current through 8/31/2011

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

; oldest data from 2011-08-31

946021444	0
946101000	0
946101001	0
946101002	0
946101009	0
946101010	0
946101011	2
946101012	2
946101013	1
946101014	1
946101015	5
946101016	3
946101017	2
946101018	0
946101019	0
946101020	1
946101021	1
946101022	2
946101023	1
946101024	2
946101025	2
946101026	1
946101027	1
946101028	1
946101029	0
946101030	0
946101031	0
946101032	2
946101033	1
946101034	0
946101035	3
946101036	1
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Total	669

EXHIBIT 5

U.S. Census Bureau

AMERICAN

FactFinder 

H1

OCCUPANCY STATUS**Universe: Housing units****2010 Census Redistricting Data (Public Law 94-171) Summary File**

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see
<http://www.census.gov/prod/cen2010/pl94-171.pdf>

NOTE: Change to the California, Connecticut, Mississippi, New Hampshire, Virginia, and Washington P. L. 94-171
Summary Files as delivered.

	Piedmont city, California
Total:	3,924
Occupied	3,801
Vacant	123

Source: U.S. Census Bureau, 2010 Census.

EXHIBIT 6

	A	B	C	D	E
1	Community	State	Total DBS Subscribers	2010 Census Occupied Housing Units	% of DBS Penetration In Franchise Area Column C / Column E
2	PIEDMONT	CA	669	3,801	17.60%

CERTIFICATE OF SERVICE

I, Deborah D. Williams, do hereby certify on this 6th day of April, 2012 that a true and correct copy of the foregoing "Petition for Special Relief" has been sent via U.S. mail, postage prepaid to the following:

Mr. Geoffrey Grote
City Administrator
120 Vista Avenue
Piedmont, CA 94611


Deborah D. Williams